

EXHIBIT A

**to Unopposed Request for Extension
of Time to Disclose Potential Expert
Report Topics**

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SECURITIES AND EXCHANGE
 COMMISSION,

Plaintiff,

vs.

CHARLES TRALKA, THOMAS
 BRAEGELMANN, MATTHEW
 SULLIVAN, JORDAN E. GOODMAN,
 ROBERT L. BARR, and GOOD STEWARD
 CAPITAL MANAGEMENT, INC.,

Defendants,

and

SECURED REAL ESTATE INCOME
 FUND I, LLC and SECURED REAL
 ESTATE INCOME STRATEGIES, LLC,

Relief Defendants.

Case No.: 5:23-cv-04958-EKL
 Judge: Eumi K. Lee
 Magistrate Judge: Nathanael M. Cousins

**DECLARATION OF TAYLOR J.
 SMITH IN SUPPORT OF
 UNOPPOSED REQUEST FOR
 EXTENSION OF TIME TO
 DISCLOSE POTENTIAL EXPERT
 REPORT TOPICS**

I, Taylor J. Smith, declare as follows:

1. I am associate counsel for Named Defendants Charles Tralka, Thomas Braegelmann, Matthew Sullivan, Robert L. Barr, and Good Steward Capital Management, Inc., and Relief Defendants Secured Real Estate Income Fund I, LLC and Secured Real Estate Income Strategies, LLC (Named Defendants, together with Relief Defendants, referred to as “Defendants”).

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1 2. On September 9, 2024, the Court entered an Order Granting Joint Stipulation to
2 Modify Scheduling Order to Extend Pre-Trial and Trial Dates (ECF No. 42), setting the Fact
3 Discovery Cutoff on February 7, 2025.

4 3. Subsequently, the parties agreed, and the Court ordered, that the Fact Discovery
5 Cutoff be extended until March 24, 2025.

6 4. At that time, Defendants were focused on extending the Fact Discovery Cutoff
7 and overlooked the need to consider and request stipulation to extension of the deadline to make
8 disclosures regarding potential topics of expert reports, which originally fell on January 10,
9 2025.

10 5. Since that time, it has become apparent that additional fact discovery will aid in
11 ensuring fulsome and accurate disclosures of potential topics of expert reports.

12 6. If the deadline is not extended, then Defendants will be substantially harmed and
13 prejudiced by a requirement to prematurely designate and disclose potential topics of expert
14 reports, notwithstanding the active state of fact discovery and the possibility that additional
15 factual developments may necessitate the need for additional topics of expert reports, which
16 would not be allowed under the current deadline.

17 7. For these reasons, Defendants have requested a 60-day extension of the deadline
18 to make disclosures regarding potential topics of expert reports, from January 10, 2025, to
19 Tuesday, March 11, 2025.

20 8. Defendants contacted Plaintiff on Thursday, January 9, 2025, regarding a
21 potential extension for the time to make the aforementioned disclosures.

22 9. While the parties could not come to an agreement on a stipulation due to a
23 difference of opinion on the time needed to make disclosures of topics of expert reports,
24 Plaintiff does not object to the motion.

25 10. Accordingly, Defendants have filed the Unopposed Request for Extension of
26 Time to Disclose Potential Expert Report Topics (ECF No. 49), to which this Declaration has
27 been attached.

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PROOF OF SERVICE

I, Michelle Hansen, am a citizen of the United States and employed in Salt Lake County, Utah. I am over eighteen (18) years of age and not a party to this action. My business address is 50 West Broadway, 10th Floor, Salt Lake City, Utah 84111. My email address is mhansen@kba.law.

On January 10, 2025, I hereby certify that a true and correct copy of the foregoing **DECLARATION OF TAYLOR J. SMITH IN SUPPORT OF UNOPPOSED REQUEST FOR EXTENSION OF TIME TO DISCLOSE POTENTIAL EXPERT REPORT TOPICS** was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon the following interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF:

Daniel O. Blau (CA Bar No. 305008) Daniel Lim (CA Bar No. 292406) Jacob Regenstreif (CA Bar No. 234734) SECURITIES AND EXCHANGE COMMISSION Katharine E. Zoladz, Regional Director Douglas Miller, Regional Trial Counsel 444 S. Flower Street, Suite 900 Los Angeles, California 90071 Telephone: (323) 965-3998 Facsimile: (213) 443-1904 Email: BlauD@sec.gov Email: LimDa@sec.gov Email: RegenstreifJ@sec.gov <i>Attorneys for Plaintiff Securities and Exchange Commission</i>	Jordan E. Goodman 11 Moorefield Court Durham, North Carolina 27705 Email: jordan@moneyanswers.com <i>Pro Se</i>
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X	By E-mail or Electronic Transmissions. I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
X	STATE: I declare under penalty of perjury under the laws of the State of California that this is true and correct.

Executed on January 10, 2025, at Salt Lake City, Utah.

/s/ Michelle Hansen
Michelle Hansen